

REMARKS

The present application has been reviewed in light of the Office Action dated May 11, 2009. Claims 1-6, 8, and 10 are presented for examination, of which Claims 1, 3, and 5 are in independent form. Claims 1, 3, and 5 have been amended to define aspects of Applicant's invention more clearly. Favorable reconsideration is requested.

The Office Action states that Claims 1-6, 8, and 10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,987,494 (*Ouchi*) in view of U.S. Patent Application Publication No. 2003/0142683 (*Lam et al.*), and further in view of a document entitled "Request for Comments No. 2462: IPv6 Stateless Address Autoconfiguration" (*Thomson et al.*). For at least the following reasons, Applicant submits that independent Claims 1, 3, and 5, together with the claims dependent therefrom, are patentably distinct from the cited prior art.

Claim 1 is directed to a composite image processing apparatus that performs a plurality of image processing functions, including a printer function and a scanner function. The composite image processing apparatus includes an IP address generator and a controller. The IP address generator is connected to an IPv6 router on a network. The IP address generator repeatedly acquires prefix information from the IPv6 router and generates an IP address unique to each of the plurality of image processing functions based on the repeatedly acquired prefix information. The controller communicates with a plurality of appliances on the network using the IP addresses generated for the plurality of image processing functions. The controller also operates each of the plurality of image processing functions to execute communications between each of the plurality of image processing functions and at least one of the plurality of appliances. Additionally, the

controller executes a transfer task for transferring packet data. The transfer task for transferring packet data is managed by an OS using buffer areas allocated to the printer function and the scanner function, respectively.

Ouchi is understood to relate to a multi-function device 1 capable of concurrently processing a plurality of control programs using time sharing methods (*see Abstract*). The multi-function information processing device 1 includes a control unit 20, a laser printer 3, and an image scanner 4 (*see col. 3, lines 7-9*). The multi-function information processing device 1 also includes a transmission interface 26 that connects to an external personal computer 6 (*see col. 3, lines 7-9*). *Ouchi* fails to provide any details regarding operation of the transmission interface 26. As best understood by Applicant, one Internet Protocol (IP) address is assigned to the transmission interface 26. That is, the external personal computer 6 is understood to communicate with the multi-function information processing device 1 using the IP address assigned to the transmission interface 26, regardless of whether a function associated with the laser printer 3 is being called or a function associated with the image scanner 4 is being called. Accordingly, nothing in *Ouchi* is believed to teach or suggest that an IP address unique to each of a plurality of image processing functions is generated, much less, that a plurality of IP addresses corresponding to a plurality of image processing functions is generated based on repeatedly acquired prefix information.

In addition, *Ouchi* discusses that the multi-function information processing device 1 includes a buffer 25 (*see col. 3, lines 7-9*). *Ouchi* fails to provide any details regarding operation of the buffer 25. *Ouchi* also discusses that the multi-function information processing device 1 includes a Random Access Memory (RAM) 14 having a

reception data memory 14a for storing data received from an incoming facsimile message, a recording data memory 14b for storing image data produced by processing the received data into a form that the laser printer 3 can use, and a variety of memories and buffers required to execute control programs for performing a plurality of functions, such as the facsimile function and the copy function (*see col. 4, lines 33-41*). The RAM 14 also includes a plurality of display data buffers, each of which corresponds to one of the control programs and is used exclusively for storing display data generated by a corresponding control program (*see col. 4, lines 42-50*). Nothing has been found in *Ouchi* that is believed to teach or suggest that a transfer task for transferring data is managed by an OS using separate buffer areas that are allocated to a printer function and a scanner function, respectively.

Lam et al. is understood to relate to a method of providing multi-user access to devices and the Internet (*see paragraph 2*). *Lam et al.* discusses that a peripheral access router 38 communicates with peripheral devices, such as a camera 44, a digital video disk player 46, a compact disk reader/writer 48, a storage hard drive 50, a scanner 52, a printer 54, a copier 56, and a telephone 58 (*see paragraph 35 and FIG. 2*). The peripheral access router 38 includes a memory 64 that stores a unique IP address for each of the peripheral devices (*see paragraph 36*).

Lam et al. fails to teach or suggest that the peripheral access router 38 generates IP addresses for the peripheral devices 76-84, much less, generates the IP addresses for the peripheral devices 76-84 based on repeatedly acquired prefix information. In addition, because a peripheral device is not a function performed by the peripheral access router 38, *Lam et al.* also fails to teach or suggest that the peripheral access router

38 generates a unique IP address for each of a plurality of image processing functions that are performed by the peripheral access router 38. Moreover, *Lam et al.* fails to teach or suggest that a device transfer task for transferring data is managed by an OS using buffer areas that are allocated to different image processing functions.

Regarding the proposed combination of *Ouchi* and *Lam et al.*, the Office Action states:

At the time of the invention, it would have been obvious to a person of ordinary skilled [sic] in the art to generate an IP address unique to each of the plurality of image processing functions on the basis of the acquired prefix information and use of the IP addresses generated for the plurality of image processing functions. The suggestion/motivation for doing so would have been to access a multiplicity of multi-media peripheral devices without the expense and complexity of an Ethernet LAN system, (paragraph [0014], lines 1-6). Therefore, it would have been obvious to combine *Ouchi* with *Lam et al.* to obtain the invention specified in claim 1.

Ouchi and *Lam et al.* disclose most of the subject matter as described as [sic] above except for specifically teaching an IP address generator connected to an IPv6 router on a network, operable to acquire prefix information

(*see* Office Action, page 7). As discussed above, neither *Ouchi* nor *Lam et al.* discloses generating a single IP address corresponding to a function, much less, generating a plurality of IP addresses each of which is unique to one of a plurality of functions. As conceded in the Office Action, neither *Ouchi* nor *Lam et al.* discloses acquiring prefix information.

Accordingly, Applicant submits that *Ouchi* and *Lam et al.*, whether considered individually or in combination, fails to teach or suggest repeatedly acquiring prefix information and generating an IP address unique to each of the plurality of image processing functions based on the repeatedly acquired prefix information.

Thomson et al. is understood to relate to autoconfiguration of IPv6 addresses (see Title). *Thomson et al.* discusses that a host computer can generate its own address using a combination of locally available information and information advertised by routers (see page 2, Introduction, paragraph 2). *Thomson et al.* fails to teach or suggest that the host generates a plurality of IP addresses, much less that the host generates a plurality of IP address for each of a plurality of image processing functions that are performed by the host based on repeatedly acquired prefix information.

In summary, Applicant submits that a combination of *Ouchi, Lam et al.*, and *Thomson et al.*, assuming such combination would even be permissible, would fail to teach or suggest a composite image processing apparatus that includes “an IP address generator, connected to an IPv6 router on a network, operable to repeatedly acquire prefix information from the IPv6 router and generate an IP address unique to each of the plurality of image processing functions based on the repeatedly acquired prefix information,” and “a controller operable to communicate with a plurality of appliances on the network using the IP addresses generated for the plurality of image processing functions and operate each of the plurality of image processing functions to execute communications between each of the plurality of image processing functions and at least one of the plurality of appliances, and to execute a transfer task for transferring packet data, wherein the transfer task for transferring packet data is managed by an OS using buffer areas allocated to the printer function and the scanner function, respectively,” as recited in Claim 1. Accordingly, Applicant submits that Claim 1 is patentable over *Ouchi, Lam et al.*, and *Thomson et al.*, whether considered separately or in combination, and respectfully requests withdrawal of the rejection of Claim 1 under 35 U.S.C. § 103(a).

Independent Claims 3 and 5 include features similar in many relevant respects to those of Claim 1 and are believed to be patentable over *Ouchi, Lam et al.*, and *Thomson et al.*, whether considered separately or in combination, for at least the same reasons as discussed above. The other rejected claims in the present application depend from independent Claim 1, 3, or 5 and are submitted to be patentable over *Ouchi, Lam et al.*, and *Thomson et al.*, whether considered separately or in combination, for at least the same reasons. Because each dependent claim also is deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

This Amendment After Final Action is believed clearly to place the present application in condition for allowance. Therefore, entry of this Amendment under 37 C.F.R. § 1.116 is believed proper and is respectfully requested, as an earnest effort to advance prosecution and reduce the number of issues. Should the Examiner believe that issues remain outstanding, it is respectfully requested that the Examiner contact Applicants' undersigned attorney in an effort to resolve such issues and advance the case to issue.

No petition to extend the time for response to the Office Action is deemed necessary for the this Amendment. If, however, such a petition is required to make this Amendment timely filed, then this paper should be considered such a petition and the Commissioner is authorized to charge the requisite petition fee to Deposit Account 06-1205.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and an early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,



Frank A. DeLucia
Attorney for Applicant
Registration No. 42,476

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

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